

**18 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BEN & JERRY’S HOMEMADE, INC.,)	
CLASS I DIRECTORS OF BEN & JERRY’S)	
INDEPENDENT BOARD)	
)	Case No. 1:24-cv-08641-PKC
Plaintiffs,)	
v.)	JURY TRIAL DEMANDED
)	
UNILEVER PLC AND CONOPCO, INC.)	
)	
Defendants.)	

NOTICE OF MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT

PLEASE TAKE NOTICE that, on March 18, 2025, upon the accompanying Memorandum of Law in Support of Plaintiffs’ Motion for Leave to File Second Amended Complaint, the exhibits thereto, and the proceedings to date herein, Plaintiffs Ben & Jerry’s Homemade, Inc. and the Class I Directors of the Ben & Jerry’s Independent Board (together, “Plaintiffs” or “Ben & Jerry’s”), by and through its undersigned attorneys, move this Court for leave to file a Second Amended Complaint pursuant to Rules 15(a) and 15(d). FED. R. CIV. P. 15(a); FED. R. CIV. P. 15(d).

This motion should be granted for the reasons set forth in the accompanying Memorandum of Law, any supporting, opposing, or reply papers which may be filed, and such other arguments and evidence that may be brought before the Court

Dated: March 18, 2025

Respectfully submitted,

AHMAD, ZAVITSANOS & MENSING PLLC

By: /s/Shahmeer Halepota

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and the Class I Directors of the Ben & Jerry's Board*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document was filed electronically on March 18, 2025. As such, this document was served on all counsel of record pursuant to the Federal Rules of Civil Procedure.

/s/Shahmeer Halepota

Shahmeer Halepota